AMENDED Exhibit 991

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT ADDICITION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION	Case No. 4:22-MD-3047
This document relates to: ALL ACTIONS	MDL No. 3047 Hon. Yvonne Gonzalez Rogers

EXPERT REPORT OF DR. JOHN CHANDLER, Ph.D.

MAY 16, 2025

The undersigned hereby certifies their understanding that they owe a primary and overriding duty of candor and professional integrity to help the Court on matters within their expertise and in all submissions to, or testimony before, the Court. The undersigned further certifies that their report and opinions are not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation.

DR. JOHN CHANDLER, Ph.D.

[redacted]

154. If we consider the other Defendants' platforms, we can see similar patterns. Snapchat embraced the idea that an entire generation of youth users (ages 13-24) can be called the Snap Generation.[102] Like Meta, Snap profiles the traits of this generation:[103]

[102] SNAP0000137. Snapchat x Cassandra. Demystifying the Snapchat Generation (June 2020).

[103] SNAP0000137 at 39 ("They focus on feeling good about themselves and life in general, so ditch the drama and help them achieve happiness as your brand taps this group for their precious time and attention.").

This cohort has come of age where smartphones live in their pockets and technology seamlessly permeates most areas of their lives. The Snapchat Generation is an always-connected group with a unique outlook on life and a new take on brands, and they're defining the trends that will shape society and business in the next few years.

The Snapchat Generation was born into an era of chaos and overstimulation, and have come of age more connected than any cohort before them. And now as they're approaching adulthood, the Covid-19 pandemic* hit. This is changing the way brands have to engage and interact with them as consumers. Brands no longer have the upperhand; today's young consumers do.

They're raising the table stakes and expecting brands to reflect their values to help them make the world a better place. No longer a captive audience of TV viewers, this hyperconnected (and sometimes overstimulated) group makes snap decisions on whether content is worth their time, so it's key that brands ensure that they're adding meaningful value to their life. They focus on feeling good about themselves and life in general, so ditch the drama and help them achieve happiness as your brand taps this group for their precious time and attention. And keep an eye on empathy as your brand strives toward innovation, which are key differentiators in the eyes of the Snapchat Generation.

Figure 19. Snapchat profiling the 'Snap Generation'

155. Snap also describes this generation in terms of its spending power, which is listed as 323 billion US dollars:[104]

[104] SNAP0000137 at 40. Spending Power, fn3 ("Cassandra Report, 2019 – Spending power for Gen Z was calculated as follows: We obtained the average monthly income for each respondent. The sum of any expenses related to rent or mortgage, debt, insurance, medical expenses/healthcare, spending money given to others, and utilities was subtracted from this average monthly income. We then multiplied each respondent's average monthly discretionary spending by 12 to obtain their average yearly discretionary spending and averaged these results across Gen Zs aged 14-22.").

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Figure 20. The demographics and spending power of the 'Snap Generation'

156. Snap strategizes on the ways that it can exploit teen traits and social needs to convert users into customers, and it pitches the idea that entertainment "earns eyeballs."[105] Its CEO, Evan Spiegel, celebrated its extreme growth in an interview with Goldman Sachs, as well as its prospects for continued growth.[106] Spiegel speaks of youth as a critical demographic and echoes the idea that younger users are the future of the platform.

[redacted]

[105] SNAP0000137 at 40–54 ("Embrace entertainment to earn eyeballs … In fact, the Snapchat Generation will turn to ads they hear are funny, interesting, or quirky.").

[106] Goldman Sachs. Evan Spiegel, Co-Founder and CEO of Snap Inc. (Oct. 2, 2019). Accessed May 6, 2025. https://www.youtube.com/watch?v=PQiKv-GCQ-w. ("Goldman Sachs 2019")

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164. The following series of charts estimate the revenue by platform and age cohort across years.

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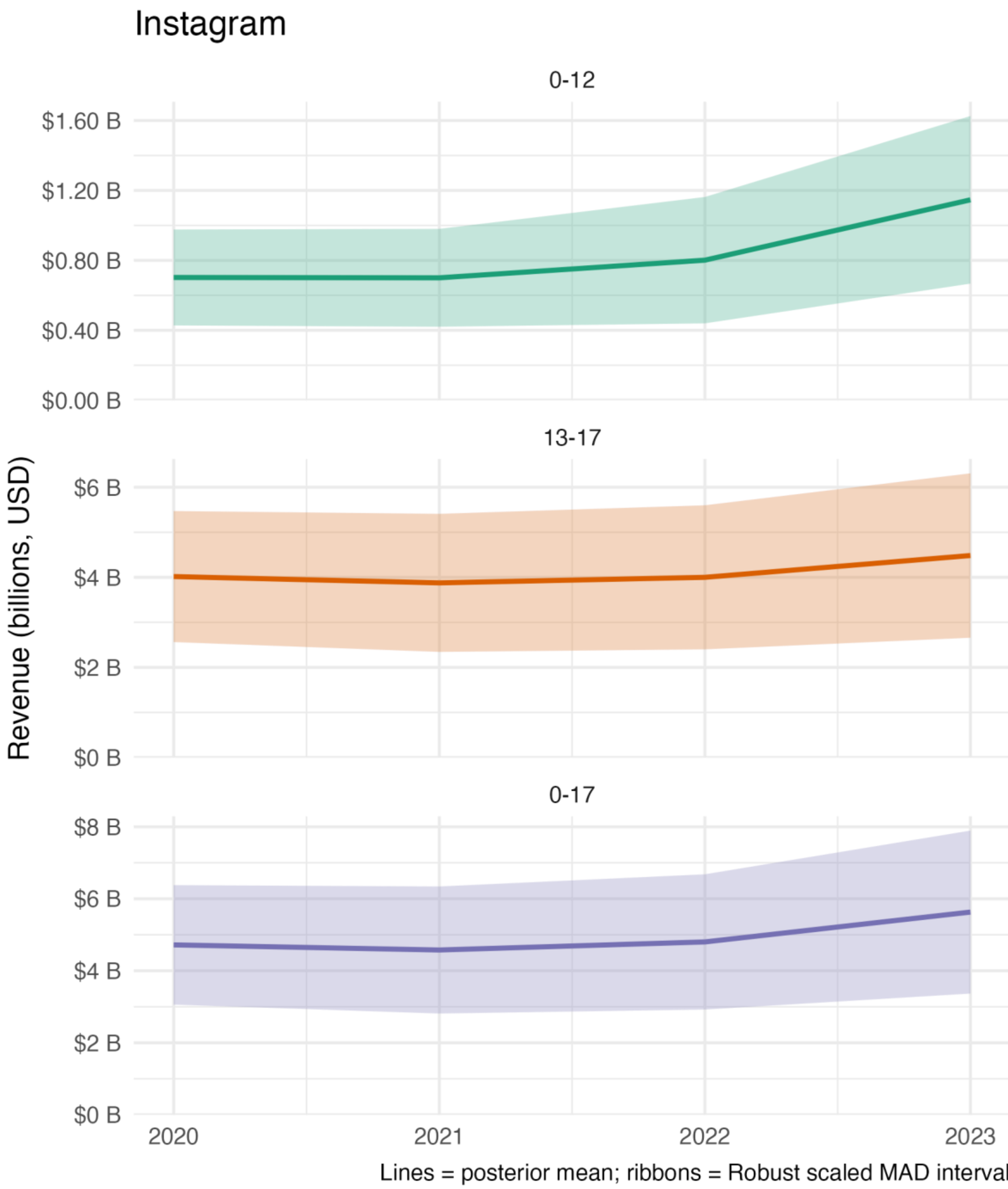

Figure 24. Estimated revenue for Instagram across years by age cohort. The uncertainty envelope represents one median absolute deviation on either side of the estimated mean.

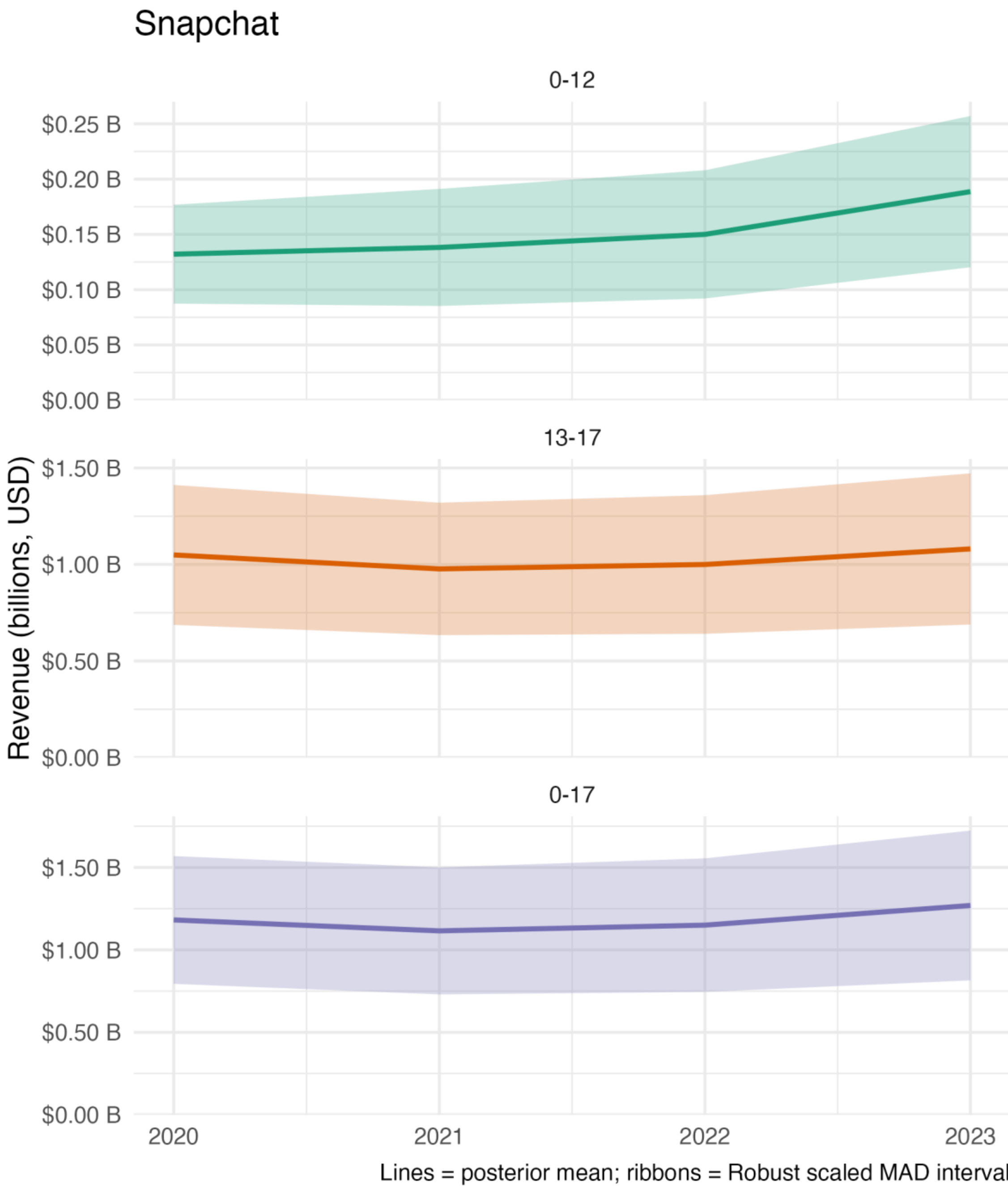

Figure 25. Estimated revenue for Snapchat across years by age cohort. The uncertainty envelope represents one median absolute deviation on either side of the estimated mean.

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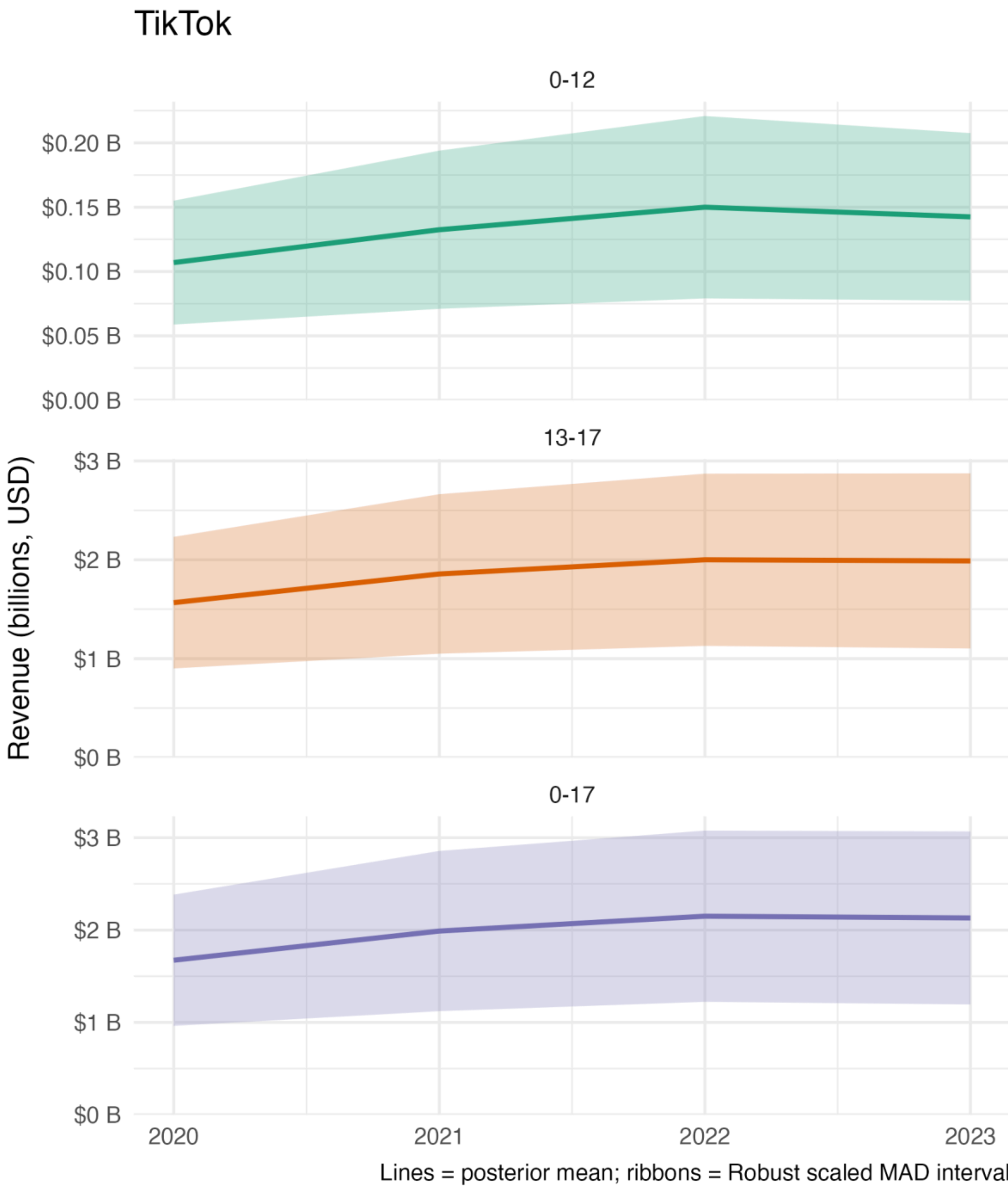

Figure 26. Estimated revenue for TikTok across years by age cohort. The uncertainty envelope represents one median absolute deviation on either side of the estimated mean.

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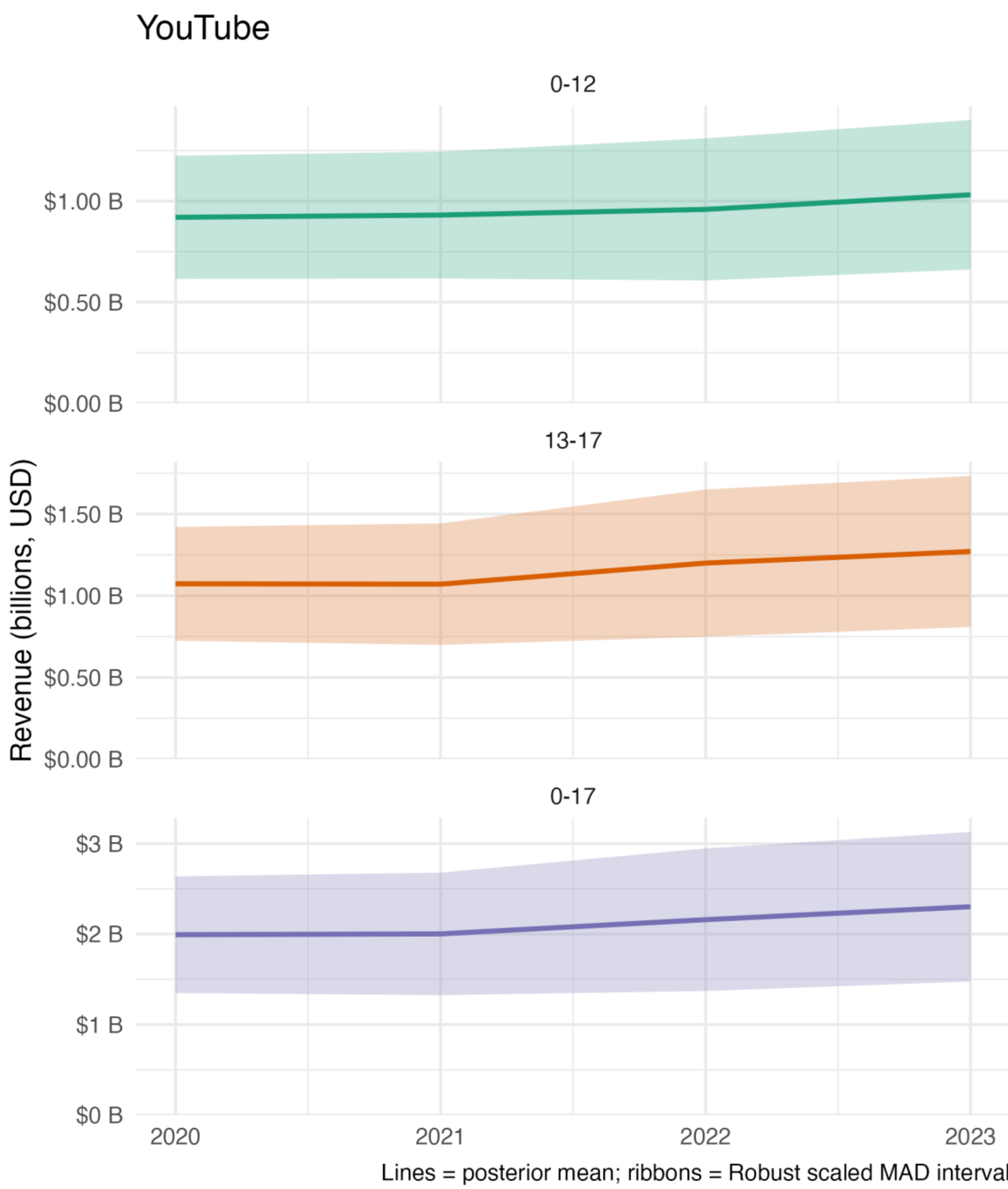

Figure 27. Estimated revenue for YouTube across years by age cohort. The uncertainty envelope represents one median absolute deviation on either side of the estimated mean.

165. My key findings are that, across 2020-2023, the four platforms together earned an estimated $40.8 billion from youth in the 0-17 age range. Using my robust uncertainty measure, a one-MAD interval, corresponding roughly to 68% coverage of possibilities, ranges from $25.2

billion to $56.4 billion. A two-MAD interval, corresponding to roughly a 95% coverage of possibilities, ranges from $9.7 billion to $72 billion.[113]

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[113] This wider interval illustrates the uncertainty in the data. Our gold-standard estimate is the PLOS One study by Raffoul, et al, which reports revenue of $10.3 billion for the four platforms in 2022 alone. The lower bound of this wider confidence interval would imply essentially zero revenue in 2020, 2021, and 2023 beyond that estimated in the study.

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